



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



N00236.001770
ALAMEDA POINT
SSIC NO.5090.3

January 8, 2004

REVA

Ms. Debbi Potter
Base Reuse and Redevelopment Manager
Alameda Reuse and Redevelopment Authority
Alameda Point/NAS Alameda
950 W. Mall Square, Building 1
Alameda, CA 94501 -5012

CITY OF ALAMEDA/APCP POSITION PAPER ON RCRA CORRECTIVE ACTION/POST-CLOSURE PERMITS AT ALAMEDA POINT

Dear Ms. Potter:

The Department of Toxic Substances Control (DTSC) has received your letter of June 20, 2003 which included a copy of above-referenced position paper. The position paper listed both Areas of Agreement and Areas of Discussion and Clarification.

Upon review, DTSC agrees with most of the points raised in the position paper. The only point DTSC wishes to make clear is with respect to "Termination of Permits for Areas Outside the Permitted/Regulated Units". Any non-permitted units such as solid waste management units (SWMUs), areas of concern (AOCs), or generation accumulation points (GAPs) are all potentially subject to corrective action. DTSC cannot terminate a hazardous waste permit unless all corrective action is complete and DTSC is able to terminate corrective action. DTSC, however, is amenable to having the non-permitted units cleaned up under a CERCLA enforceable agreement.

If you have any questions regarding this issue, please contact Ms. Wei-Wei Chui of my staff at (510) 540-3975.

Sincerely,

Mohinder S. Sandhu, P.E. Chief
Standardized Permitting and Corrective Action Branch

Ms. Debbi Potter

January 8, 2004

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cc: Mr. Lou Ocampo
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

Mr. Tony Landis, Branch Chief
Office of Military
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Ms. Isabella Alasti, Esq.
Office of Legal Counsel
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Ms. Nancy Long, Esq.
Office of Legal Counsel
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
Sacramento, California 95812-0806

Mr. Daniel E. Murphy, Section Chief
Office Military Facilities
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California 94710

Mr. Dean Wright
Standardized Permitting and Corrective Action Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

cc: 1/12/04

as per 1/12/04

Rex Callaway
Thomas Macchiarola